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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In re:

GIGA WATT, Inc., a Washington
corporation,

Debtor.

Case No. 18-03197 FPC 11

The Honorable Frederick P. Corbit

**DECLARATION OF PAMELA M.
EGAN IN SUPPORT OF OMNIBUS
OPPOSITION OF THE CHAPTER
11 TRUSTEE TO: (I) NOTICE AND
MOTION TO COMPEL TRUSTEE
TO ABANDON ALLRISE MINING
POD AND (II) APPLICATION OF
ALLRISE FINANCIAL GROUP FOR
ALLOWANCE AND PAYMENT OF
ADMINISTRATIVE EXPENSE
CLAIM**

DECLARATION OF PAMELA M. EGAN

1 I, Pamela M. Egan, declare as follows:

2 1. My law firm is counsel to the duly-appointed Chapter 11 Trustee (the
3 “**Trustee**”) in the bankruptcy case of the above-captioned debtor (the “**Debtor**” or
4 “**Giga Watt**”). I submit this declaration in support of the *Omnibus Opposition of*
5 *the Chapter 11 Trustee to: (i) Notice and Motion to compel Trustee to Abandon*
6 *Allrise Mining Pod and (ii) Application of Allrise Financial Group for Allowance*
7 *and Payment of Administrative Expense Claim* (the “**Opposition**”). The
8 statements set forth herein are based on my personal knowledge, except where
9 otherwise noted. If called as a witness, I would and could competently testify
thereto.

10 2. Unless otherwise defined herein, capitalized terms have the meanings
ascribed to them in the Opposition.

11 3. A true and correct copy of the Master Lease is attached to the
12 Opposition as **Exhibit A**.

13 4. A true and correct copy of the Sublease is attached to the Opposition
14 as **Exhibit B**.

15 5. A true and correct copy of the Service Agreement is attached to the
16 Opposition as **Exhibit C**.

17 6. A true and correct copy of the Development Agreement is attached to
the Opposition as **Exhibit D**.

18 7. A true and correct copy of the Purchase and Sale Agreement is
19 attached to the Opposition as **Exhibit E**.

20 8. At my request, Allrise produced all of its correspondence with Giga
21 Watt. A true and correct copy of that correspondence is attached to the Opposition
22 as **Exhibit F**.

1 9. I have reviewed the Debtor's Schedules of Assets and Liabilities and
2 its Statement of Financial Affairs. They omit any mention of Allrise.

3 10. I have searched the Grant County, Washington public records to see
4 if Allrise ever publicly recorded any interest in the Pod. None was found. The
5 Moses Lake Facility is located in Grant County, Washington.

6 11. A true and correct copy of the amended Master Lease is attached to
7 the Opposition as **Exhibit G**.

8 12. A true and correct copy of the Consent Order is attached to the
9 Opposition as **Exhibit H**.

10 13. A true and correct copy of email correspondence received from
11 Allrise is attached to the Opposition as **Exhibit I**.

12 14. A true and correct copy of the Consent Order is attached to the
13 Opposition as **Exhibit J**.

14 15. A true and correct copy of a letter from the Trustee to Allrise, dated
15 August 9, 2019, is attached to the Opposition as **Exhibit K**.

16 16. A true and correct copy of correspondence, dated May 10, 2019,
17 received from Allrise is attached to the Opposition as **Exhibit L**.

18 17. A true and correct copy of correspondence, dated October 9, 2019,
19 received from Allrise is attached to the Opposition as **Exhibit M**.

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23 *[This Declaration continues on the next page.]*

18. I searched the public records of the Washington Secretary of State and found that no company with the name Allrise is registered to do business in the state of Washington.

To the best of my knowledge, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 17th day of February 2020 in Seattle, Washington.

/s/ Pamela M. Egan

Pamela M. Egan4814-6344-9781, v. 1